

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JEDONNE MATTHEWS,)	
)	
Plaintiff,)	
)	
vs.)	NO.
)	JURY DEMAND
WALMART, INC.,)	
WAL-MART STORES EAST, LP, and)	
WAL-MART SUPERCENTER #673,)	

NOTICE OF REMOVAL

Defendants Walmart, Inc., Wal-Mart Stores East, LP, and Wal-Mart Supercenter #673 (collectively “Wal-Mart”) hereby gives Notice of the removal pursuant to 28 U.S.C. § 1441 et. seq., of the following action filed against it: Jedonne Matthews v. Walmart, Inc., Wal-Mart Stores East, LP, and Wal-Mart Supercenter #673; In the Circuit Court for Montgomery County, Tennessee; No. CC-2021-CV-1572. Copies of the summons and complaint are attached as Exhibits A and B, respectively. Plaintiff is a citizen and resident of Montgomery County, Tennessee. Defendant Wal-Mart is a Delaware limited partnership with its principal place of business in Bentonville, Arkansas. Wal-Mart Stores East, LP operated the subject premises on the date of this accident. Walmart Inc. is not a proper party to this action. Defendant Wal-Mart Stores East, LP, is a Delaware limited partnership. WSE Management, LLC, a Delaware limited liability company, is the general partner, and WSE Investment, LLC, a Delaware limited liability company, is the limited partner. The sole member of WSE Management, LLC, and WSE Investment, LLC, is Wal-Mart Stores East, LLC, fka Wal-Mart Stores East, Inc., an Arkansas limited liability company. Wal-Mart Stores East, Inc., was converted to an Arkansas limited

liability company on January 25, 2011. The principal place of business for all entities mentioned is 702 SW 8th Street, Bentonville, Arkansas.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states. Plaintiff seeks \$200,000.00 in damages, which is in excess of the federal jurisdictional requisite.

Wal-Mart was served on August 26, 2021. It has been less than thirty (30) days since Wal-Mart was served the summons and complaint. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b).

WHEREFORE, Wal-Mart hereby gives Notice of the removal of this action pending in the Circuit Court for Montgomery County, Tennessee at Clarksville, to the United States District Court for the Middle District of Tennessee, Nashville Division, and requests that the proceedings be held thereon.

s/ Greg Callaway
Greg Callaway, No. 18575
Howell & Fisher, PLLC
3310 West End Avenue, Suite 550
Nashville, TN 37203
Direct: (615) 921-5226
Office: (615) 244-3370
Fax: (615) 244-3518
Email: gcallaway@howell-fisher.com
Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via U.S. Mail upon Harlene Labrum, 718 Thompson Lane, Suite 108-242, Nashville, TN 37204; on this 20th day of September, 2021.

s/ Greg Callaway

W:\GWC\Matthews.Jedonne\Notice of Removal 9-20-21.wpd